

PISANELLIBICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

James J. Pisanelli, Esq., Bar No. 4027
JJP@pisanellibice.com
Debra L. Spinelli, Esq., Bar No. 9695
DLS@pisanellibice.com
M. Magali Mercera, Esq., Bar No. 11742
MMM@pisanellibice.com
PISANELLI BICE PLLC
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101
Telephone: 702.214.2100

*Attorneys for Paris Las Vegas
Operating Company, LLC*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TPOV ENTERPRISES 16, LLC, a Delaware
Limited Liability Company,

Plaintiff,

vs.

PARIS LAS VEGAS OPERATING
COMPANY, LLC, a Nevada limited liability
company,

Defendant.

CASE NO. 2:17-cv-00346-JCM-VCF

**STIPULATION AND PROPOSED
ORDER EXTENDING DEADLINE TO
FILE REPLY IN SUPPORT OF
COUNTERMOTION FOR PROTECTIVE
ORDER**

(SECOND REQUEST)

PARIS LAS VEGAS OPERATING
COMPANY, LLC, a Nevada limited liability
company,

Counterclaimant.

vs.

TPOV ENTERPRISES, LLC, a Delaware
Limited Liability Company, TPOV
ENTERPRISES 16, LLC, a Delaware Limited
Liability Company, Rowen Siebel, an
individual.

Counter-defendants.

Pursuant to LR IA 6-1, Plaintiff/Counterdefendant TPOV Enterprises 16, LLC ("TPOV 16");
Counterdefendant TPOV Enterprises, LLC ("TPOV"); Counterdefendant Rowen Seibel ("Seibel")
(collectively, "Seibel and the TPOV Entities"); and Defendant/Counterclaimant Paris Las Vegas

PISANELIBICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101

Operating Company, LLC ("Paris") (collectively, the "Parties"), by and through their undersigned counsel of record, stipulate and agree as follows:

1. On July 16, 2021, TPOV 16 filed a Motion to Compel Updated Financial Data (the "Motion to Compel"). (ECF No. 313.)

2. On August 13, 2021, Paris filed its Opposition to the Motion to Compel (ECF No. 322) and a Countermotion for Protective Order (the "Countermotion") (ECF No. 323).

3. On August 27, 2021, TPOV 16 filed its Reply in Support of the Motion to Compel (ECF No. 332) and its Response to the Countermotion (ECF No. 333).

4. On September 3, 2021, the Parties filed a Stipulation and Proposed Order Extending Deadline to File Reply in Support of Countermotion for Protective Order (First Request). (ECF No. 336.)

5. On September 7, 2021, the Court granted the Parties' Stipulation and Proposed Order Extending Deadline to File Reply in Support of Countermotion for Protective Order (First Request). (ECF No. 337.)

6. Currently, the deadline to file a Reply in support of the Countermotion is September 10, 2021.

7. The Parties have agreed and respectfully request that the deadline to file a Reply in Support of the Countermotion be extended by seven (7) days to September 17, 2021, to allow Paris additional time to finalize the Reply.

///

8. This is the second request to extend time, is made in good faith, with good cause, and will not impact any other deadlines.

DATED this 10th day of September 2021.

DATED this 10th day of September 2021.

PISANELLI BICE PLLC

BAILEY KENNEDY

By: /s/ M. Magali Mercera
James J. Pisanelli, Esq., Bar No. 4027
Debra L. Spinelli, Esq., Bar No. 9695
M. Magali Mercera, Esq., Bar No. 11742
400 South 7th Street, Suite 300
Las Vegas, Nevada 89101

By: /s/ Joshua P. Gilmore
John R. Bailey, Esq., Bar No. 0137
Dennis L. Kennedy, Esq., Bar No. 1462
Joshua P. Gilmore, Esq., Bar No. 11576
Paul C. Williams, Esq., Bar No. 12524
8984 Spanish Ridge Avenue
Las Vegas, NV 89148-1302

*Attorneys for Paris Las Vegas Operating
Company, LLC*

*Attorneys for TPOV Enterprises 16, LLC,
TPOV Enterprises, LLC and Rowen Seibel*

ORDER

IT IS SO ORDERED.

UNITED STATES MAGISTRATE JUDGE

DATED: 9-13-2021

PISANELLI BICE PLLC
400 SOUTH 7TH STREET, SUITE 300
LAS VEGAS, NEVADA 89101